

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO:**

*Gaston Roberts et al. v. Zhejiang  
Huahai Pharmaceutical Co., et al.,*

Case No. 1:20-cv-00946-RBK-JS

MDL No. 2875

Honorable Renée Marie Bumb  
District Court Judge

**DECLARATION OF NINA ROSE IN SUPPORT OF DEFENDANTS' MOTION  
TO EXCLUDE THE OPINIONS OF DR. JOHN RUSSO**

I, Nina Rose, declare as follows:

I am an attorney and a partner with the law firm Kirkland & Ellis LLP, counsel for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc. ("Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Memorandum of Law in Support of Motion to Exclude the Opinions of Dr. John Russo.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of John A. Russo, M.D., dated Mar. 10, 2025.
2. Attached hereto as **Exhibit 2** is a true and correct copy of the Deposition Transcript of John A. Russo, M.D., dated May 13, 2025.

3. Attached hereto as **Exhibit 3** is a true and correct copy of the Deposition Transcript of Ralph S. Buckley, M.D., dated Feb. 7, 2025.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: May 22, 2025

Respectfully submitted,

*/s/ Nina R. Rose*

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Nina R. Rose (*pro hac vice*)  
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Pharmaceutical Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 22, 2025, a true and correct copy of the foregoing document was served upon counsel of record via operation of the Court's electronic filing system.

Dated: May 22, 2025

Respectfully submitted,

*/s/ Nina R. Rose*

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